

Northern District - Western Division

Rodney A. GEREN, Pro SE  
Plaintiff

vs

Paul A. Dobson, Wood Co. Prosecutor  
Gwen Howes-Gebbers, Chief Asst. Pros.  
Detective Rod Smith, Wood Co. Sheriff  
Police Chief Fairbanks, Rising Sun, OH  
Kurt W. Bradely, Esq.  
Defendants

CASE NO:

FILED

Judge

2015 DEC 11 PM 12:03

Application  
BOND Legal Assistance

3:15 CV 2561

MAG. JUDGE JAMES R. KNEPP II  
JUDGE HELMICK

Now Comes Rodney A. GEREN, Pro SE petitioner in this action pleading his need of Pro Bono Aid in this matter. A very SERIOUS MATTER of illegal acts by a State Prosecutor and his Lawful Agents. Unlawful Acts that need to be EXPOSED and duly punished to prevent any more unlawful Acts such as this to occur again.

This Petitioner does realize Pro Bono Aid is a matter of discretion by the Courts. But in considering an application the Court must look at the people named as defendants and just how unfair the legal skill and/or representation will be. The plaintiff is an indigent person with no legal training, a factor that supports the Pro Bono request. *Whisenant v Yaum*, 739 F.2d 160, 163 (4th Cir. 1984)

Also I will not be able to investigate and acquire logs, reports and statements since it is well known that the type of defendants do a lot to shield and/or hide facts that support the claim. *Tucker v Dickey* 613 F. Supp. 1124, 1133-34 (W.D. Wis. 1985) Not to mention to sort out the conflicting testimony, statements and credibility issues involved. *Gatson v Coughlin*, 679 F. Supp. 270, 273 (W.D. W.V. 1988)

Then we move on to the large number of defendants and their respective professions that assuredly will amount to legal complexities and tactics they'll employ to get out of any responsibility they are due and should be held

Accountable For. They know their actions are heinous and will do legal complexity like unseen before. Therefore Abdullah v Guter, 949 F.2d. 1032, 1036 (8th Cir. 1991) is a relevant issue.

And lastly, Merit of the case. To put it simply, the facts are set in stone and the transcripts of 13-CR-402-452 in Wood Co., Ohio. The defendants can not deny these events happened. Also by a legal statements by Kurt W. Brudersly and Lawrence Gold, former attorneys in stated case in Wood County. There is zero ability to deny these things happened at all. ZERO!

### CONCLUSION

No citizen in these UNITED STATES should ever be subjected to these vindictive and vile illegal acts by State Agents who have a sworn duty to uphold the law and not abuse their powers. These acts are a continued attack on my rights since Dec. 2004 by the Wood Co. Prosecutor's Office and the name Police and Sheriff Agencies. There is not one fact or statement I can not back up with records. Some will need a discovery order to get, but I do know they exist.

PLEASE grant me Pro Bono Legal Aid so I can get these people to stop violating my rights in the vindictive and unlawful manner I've been subjected too since Dec. 2004.

Respectfully  
Rodney A. Gore